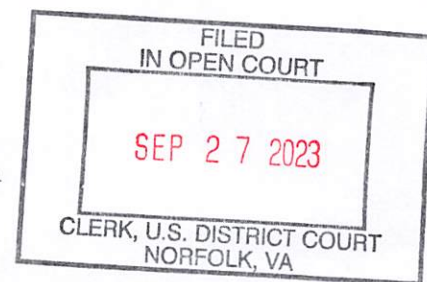


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
*Norfolk Division*



UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 2:22cr101
	)	
RONALD DAMONE JENKINS, JR.,	)	18 U.S.C. § 1959(a)(5)
a/k/a "G,"	)	Conspiracy to Commit Murder in Aid of
a/k/a "GG,"	)	Racketeering
a/k/a "Gee,"	)	(Count 1)
a/k/a "Gee Gee,"	)	
(Counts 1, 4, 5 and 6)	)	18 U.S.C. §§ 1959(a)(5) and 2
	)	Attempted Murder in Aid of Racketeering
JAPREE LORTEZ BROOKS,	)	(Counts 2 and 4)
a/k/a "Choppa,"	)	
a/k/a "Khoppa,"	)	18 U.S.C. §§ 924(c)(1)(A) and 2
a/k/a "Primo,"	)	Discharge, Carry, and Use Firearm During and
(Counts 1, 2, 3, 7 and 8)	)	in Relation to Crime of Violence
	)	(Counts 3 and 5)
and	)	
	)	
MALIK TREVONTE NEWSOME,	)	18 U.S.C. §§ 922(g)(1) & 924(a)(2) (2006)
a/k/a "Red,"	)	Felon in Possession of Firearm and Ammunition
a/k/a "Redd,"	)	(Count 6)
a/k/a "Hitman Redd,"	)	
(Count 1 and 9)	)	18 U.S.C. §§ 1512(b)(1)
	)	Witness Tampering and Obstruction of an
	)	Official Proceeding
Defendants.	)	(Counts 7-9)
	)	
	)	18 U.S.C. §§ 924(d) & 28 U.S.C. § 2461
	)	Criminal Forfeiture
	)	
	)	

**SECOND SUPERSEDING INDICTMENT**

September 2023 Term – at Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Commit Murder in Aid of Racketeering)

**The Enterprise**

1. The defendants, RONALD DAMONE JENKINS, JR., a/k/a “G,” a/k/a “GG,” a/k/a “Gee,” a/k/a “Gee Gee”; JAPREE LORTEZ BROOKS, a/k/a “Choppa,” a/k/a “Khoppa,” a/k/a “Primo”; MALIK TREVONTE NEWSOME, a/k/a “Red,” a/k/a “Redd,” a/k/a “Hitman Redd”; and others known and unknown to the grand jury, were members and associates of the Franklin Enterprise (the “Enterprise”), which operated in and around Franklin, Virginia, within the Eastern District of Virginia. This was a criminal organization whose members and associates engaged in acts of violence, including acts involving murder, as well as witness intimidation and narcotics trafficking.

2. The Enterprise including its leadership, its membership, and its associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, that engaged in, and the activities of which, affected interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

3. The Enterprise copied many of its rules from the United Blood Nation (“UBN”), a gang alliance created within the Riker’s Island prison complex in or about 1993.

4. The UBN is broken down into individual units called “sets,” which utilize common tattoos, communication codes, and language, and are identified by wearing the color red. The Enterprise’s leader, B.L., held a position of regional leadership in one of the various UBN sets.

Several other members and associates of the Enterprise are also members of various UBN sets.

5. Upon his release from state prison in or about 2015, B.L. returned to Franklin, where he assumed his position of leadership over members and associates of the Enterprise. B.L. was well-known throughout the community of Franklin, Virginia for his ruthless demeanor and reputation for violence, which enabled him to control the criminal activities that took place within that territory.

6. B.L. and other members and associates of the Enterprise held meetings to discuss criminal activities and other gang-related business at a residence shared by B.L. and Enterprise member E.L. located on Railroad Avenue in Franklin, Virginia. B.L. and other Enterprise members and associates also used this residence to distribute narcotics, including, but not limited to, heroin, cocaine, cocaine base, also known as “crack” cocaine, and marijuana. Enterprise members and associates distributed narcotics in Franklin, Virginia with B.L.’s permission. Moreover, rival gang members sought B.L.’s authorization to conduct criminal activity in Franklin since it was under B.L.’s control.

7. In the Enterprise’s Franklin, Virginia territory, members and associates of the Enterprise maintained a unique relationship with the Crip-affiliated neighborhood gang, the “00 Gang” (“00”). For example, Enterprise members and associates and 00 members and associates were non-violent in some social settings.

8. However, in or about December 2017, following disputes between B.L., members and associates of the Enterprise, and 00 members, a rivalry developed. Shortly after these public disputes arose, B.L. was murdered, which triggered a series of retaliatory attacks by Enterprise members and associates seeking to reestablish their position of authority in Franklin, Virginia territory following B.L.’s untimely death.

9. The Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving drug trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

**Purposes and Objectives of the Enterprise**

10. The purposes of the Enterprise included the following:
- a. Enriching the members and associates of the Enterprise through, among other things, narcotics distribution and firearm violations.
  - b. Preserving and protecting the power, territory, and profits of the Enterprise through the use of intimidation, violence, including acts involving murder, and threats of violence.
  - c. Promoting and enhancing the Enterprise and its members' and associates' activities.
  - d. Keeping victims in fear of the Enterprise and in fear of its members and associates through violence and threats of violence.

**Manner and Means of the Enterprise**

11. Among the manner and means by which the members and associates conducted and participated in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the Enterprise conspired, committed, attempted, and threatened to commit acts of violence, including acts involving murder and assault with a dangerous weapon, to protect and expand the Enterprise's criminal operations.
- b. Members and associates of the Enterprise promoted a climate of fear

through violence and threats of violence.

- c. Members and associates of the Enterprise used and threatened to use violence against various individuals, including individuals associated with rival gangs.
- d. Members and associates of the Enterprise trafficked in cocaine, cocaine base, also known as “crack” cocaine, heroin, and marijuana.

12. From on or about December 17 to December 19, 2017, in the Eastern District of Virginia and elsewhere, the defendants, RONALD DAMONE JENKINS, JR., a/k/a “G,” a/k/a “GG,” a/k/a “Gee,” a/k/a “Gee Gee”; JAPREE LORTEZ BROOKS, a/k/a “Choppa,” a/k/a “Khoppa,” a/k/a “Primo”; MALIK TREVONTE NEWSOME, a/k/a “Red,” a/k/a “Redd,” a/k/a “Hitman Redd”; and others, both known and unknown to the grand jury, for the purpose of maintaining and increasing position in the Franklin Enterprise, an enterprise engaged in racketeering activity, did knowingly and willfully conspire to murder 00 Gang members and associates in violation of Virginia Code §§ 18.2-32 and 18.2-22.

(In violation of Title 18, United States Code, Section 1959(a)(5).)

COUNT TWO  
(Attempted Murder in Aid of Racketeering)

1. Paragraphs One through Eleven of Count One of this Second Superseding Indictment are re-alleged and incorporated as if fully set forth herein.

2. On or about December 18, 2017, in Franklin, Virginia, in the Eastern District of Virginia, the defendant, JAPREE LORTEZ BROOKS, a/k/a “Choppa,” a/k/a “Khoppa,” a/k/a “Primo”; for the purpose of maintaining and increasing position in the Franklin Enterprise, an enterprise engaged in racketeering activity, did unlawfully and knowingly attempt to murder individual occupants of the residence located in the 2200 block of South Street in Franklin, Virginia, in violation of Va. Code Ann. §§ 18.2-32, 18.2-26, and 18.2-18.

(In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.)

COUNT THREE

(Discharge, Carry, and Use Firearm During and in Relation to Crime of Violence)

1. On or about December 18, 2017, in Franklin, Virginia, in the Eastern District of Virginia, the defendant, JAPREE LORTEZ BROOKS, a/k/a “Choppa,” a/k/a “Khoppa,” a/k/a “Primo”; aided and abetted by others, did knowingly discharge, carry, and use a firearm during and in relation to, and did knowingly possess a firearm in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, to wit: Attempted Murder in Aid of Racketeering, in violation of Title 18, United States Code, Section 1959(a)(5), as set forth in Count Two of this Second Superseding Indictment, which is re-alleged and incorporated by reference herein.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.)

COUNT FOUR

(Attempted Murder in Aid of Racketeering Activity)

1. Paragraphs One through Eleven of Count One of this Second Superseding Indictment are re-alleged and incorporated as if fully set forth herein.

2. On or about February 8, 2019, in Franklin, Virginia, in the Eastern District of Virginia, the defendant, RONALD DAMONE JENKINS, JR., a/k/a “G,” a/k/a “GG,” a/k/a “Gee,” a/k/a “Gee Gee,” and others, both known and unknown to the grand jury, for the purpose of maintaining and increasing position in the Franklin Enterprise, an enterprise engaged in racketeering activity, did unlawfully and knowingly attempt to murder S.M., in violation of Va. Code Ann. §§ 18.2-32, 18.2-26, and 18.2-18.

(In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.)



COUNT FIVE

(Discharge, Carry, and Use Firearm During and in Relation to Crime of Violence)

1. On or about February 8, 2019, in Franklin, Virginia, in the Eastern District of Virginia, the defendant, RONALD DAMONE JENKINS, JR., a/k/a “G,” a/k/a “GG,” a/k/a “Gee,” a/k/a “Gee Gee,” aided and abetted by others, both known and unknown to the grand jury, did knowingly discharge, carry, and use a firearm during and in relation to, and did knowingly possess a firearm in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, to wit: Attempted Murder in Aid of Racketeering Activity, in violation of Title 18, United States Code, Section 1959(a)(5), as set forth in Count Four of this Second Superseding Indictment, which is re-alleged and incorporated by reference herein.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.)

COUNT SIX  
(Felon in Possession of Ammunition)

1. On or about February 8, 2019, in Franklin, Virginia, in the Eastern District of Virginia, the defendant, RONALD DAMONE JENKINS, JR., a/k/a “G,” a/k/a “GG,” a/k/a “Gee,” a/k/a “Gee Gee,” knowing that he had been previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce ammunition, to wit: six Winchester .223 caliber/5.56mm cartridge cases, six Lake City .223 caliber/5.56mm cartridge cases, one Hornady .223 caliber cartridge case, and one PMC .223 caliber cartridge case, all of which had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) (2006).)

COUNT SEVEN

(Witness Tampering and Obstruction of an Official Proceeding)

1. On or about May 18, 2023, within the Eastern District of Virginia, the defendant, JAPREE LORTEZ BROOKS, a/k/a “Choppa,” a/k/a “Khoppa,” a/k/a “Primo,” did knowingly intimidate, threaten, and corruptly persuade one or more persons, and attempt to do the same, with the intent to influence, delay, and prevent the testimony of one or more persons in an official proceeding, to wit: the trial in *United States v. Ronald Jenkins et al.*, 2:22-cr-101.

(In Violation of Title 18, United States Code, Section 1512(b)(1).)

COUNT EIGHT

(Witness Tampering and Obstruction of an Official Proceeding)

1. On or about September 12, 2023, within the Eastern District of Virginia, the defendant, JAPREE LORTEZ BROOKS, a/k/a “Choppa,” a/k/a “Khoppa,” a/k/a “Primo,” did knowingly intimidate, threaten, and corruptly persuade one or more persons, and attempt to do the same, with the intent to influence, delay, and prevent the testimony of one or more persons in an official proceeding, to wit: the trial in *United States v. Ronald Jenkins et al.*, 2:22-cr-101.

(In Violation of Title 18, United States Code, Section 1512(b)(1).)

COUNT NINE

(Witness Tampering and Obstruction of an Official Proceeding)

1. On or about July 31, 2023, within the Eastern District of Virginia, the defendant, MALIK TREVONTE NEWSOME, a/k/a “Red,” a/k/a “Redd,” a/k/a “Hitman Redd,” did knowingly intimidate, threaten, and corruptly persuade one or more persons, and attempt to do the same, with the intent to influence, delay, and prevent the testimony of one or more persons in an official proceeding, to wit: the trial in *United States v. Ronald Jenkins et al.*, 2:22-cr-101.

(In Violation of Title 18, United States Code, Section 1512(b)(1).)

**CRIMINAL FORFEITURE**

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. Upon conviction of any of the offenses alleged in this Second Superseding Indictment, the defendants, RONALD DAMONE JENKINS, JR., a/k/a “G,” a/k/a “GG,” a/k/a “Gee,” a/k/a “Gee Gee”; JAPREE LORTEZ BROOKS, a/k/a “Choppa,” a/k/a “Khoppa,” a/k/a “Primo”; and MALIK TREVONTE NEWSOME, a/k/a “Red,” a/k/a “Redd,” a/k/a “Hitman Redd” shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461, any firearm or ammunition involved in or used in the violation.

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p), and Federal Rule of Criminal Procedure 32.2(e).

3. The property subject to forfeiture includes, but is not limited to, the following:

- (1) One Sig Sauer, Model P226, 9mm semi-automatic pistol, including any related magazines and ammunition;
- (2) One Rossi, Model R462, .357 magnum revolver, including any related magazines and ammunition;
- (3) One I.O. Inc., Model AKM247T, 7.62x39 caliber AK-type rifle, including any related magazines and ammunition;
- (4) One Diamondback, Model DB-15, .223 caliber semi-automatic AR-type rifle, including any related magazines and ammunition; and
- (5) One Diamondback, Model DB-10, .308 caliber semi-automatic AR-type rifle, including any related magazines and ammunition.

(In accordance with Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code, Section 2461(c).)

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

*United States v. Ronald Damone Jenkins, Jr. et al.*, 2:22CR101

A TRUE BILL:

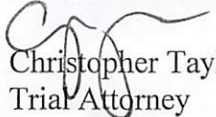
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